

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WOLVERINE PROCTOR & SCHWARTZ)
INC., and GREAT AMERICAN)
ALLIANCE INSURANCE CO., INC.)
Plaintiffs)

v.)

XYZ TAPE CORP., f/k/a PATCO CORP.,)
WILLIAM B. WILBUR, and)
TRAVELERS PROPERTY CASUALTY)
COMPANY OF AMERICA,)
Defendants.)

Civil Action No. 04-12189RWZ

**MOTION BY DEFENDANT TRAVELERS PROPERTY CASUALTY COMPANY OF
AMERICA TO JOIN IN SUMMARY JUDGMENT MOTION FILED BY XYZ TAPE
CORP. AND WILLIAM WILBUR**

Pursuant to Local Rule 7.1A, the defendant, Travelers Property Casualty Company of America (“Travelers”), joins in the motion for summary judgment filed by co-defendants XYZ Tape Corp. f/k/a Patco Corp., and William B. Wilbur. As grounds for this motion, Travelers states that the claims against it are entirely derivative of the claims against the co-defendants and if the Court grants said motion for summary judgment, it should enter summary judgment in favor of Travelers as well.

WHEREFORE, the defendant, Travelers Property Casualty Company of America joins in, adopts and incorporates by reference the motion for summary judgment (including the statement of facts, affidavits and memorandum) filed by William Wilbur and XYZ Tape Corp.

Respectfully submitted,
Travelers Property Casualty
Company of America

/s/ Joseph S. Berman
Joseph S. Berman, Esq.
BBO No. 566006
Berman & Dowell
210 Commercial St.
Boston, MA 02109
617-723-9911

CERTIFICATE OF SERVICE

I, Joseph S. Berman, hereby certify that on this 23rd day of September, 2005, I filed a copy of the foregoing by electronic means with the United States District Court for the District of Massachusetts using the CM/ECF system, which will send notification to the following: Matthew J. Walko, Esq., Smith & Duggan LLP, Two Center Plaza, Suite 620, Boston, MA 02108; and Lee MacPhee, Esq., Morrison Mahoney LLP, 250 Summer Street, Boston, MA 02210 and that the document has been served on all counsel of record in compliance with the Federal Rules of Civil Procedure.

/s/ Joseph S. Berman
Joseph S. Berman
